

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
Plaintiff,	:	Case No. 2:19-CR-202
v.	:	Judge Michael H. Watson
THOMAS ROMANO,	:	
Defendant.	:	

DEFENDANT’S MOTION FOR MODIFICATION OF REPORT DATE

Now comes Defendant, Thomas Romano, through undersigned counsel, and respectfully moves the Court for an Order modifying his report date. The reasons in support of this Motion are set forth in the following Memorandum.

Respectfully Submitted,

/s/ Samuel H. Shamansky
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Counsel for Defendant

MEMORANDUM

Following jury trial, Defendant was convicted of twenty-four counts of Unlawful Distribution and Dispensing of Controlled Substances in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(C) and 18 U.S.C. § 2. On May 2, 2024, the Court proceeded to sentencing and ordered Defendant to serve an eighty-four-month term of incarceration. At that hearing, the Court orally indicated that Defendant would remain out of government custody during the pendency of his appeal. As such, the Court ordered Defendant to self-report to the Bureau of Prisons by March 3, 2025.

On May 29, 2024, Defendant timely submitted a Notice of Appeal to the United States Court of Appeals for the Sixth Circuit. As the Court is aware, this matter involves a particularly voluminous record and complicated procedural background. As such, both parties have obtained multiple extensions while preparing briefs. The government's Brief is currently due on February 6, 2025, after which Defendant intends to file a substantial Reply. Given that briefing is still ongoing, it is unlikely that Defendant's appeal will be resolved by March 3, 2025. Accordingly, Defendant respectfully moves the Court for a written Order continuing his report date until such time that his appeal has been resolved.

This request has been discussed with Assistant Chief Alexis Gregorian, who indicated that at sentencing, the government was opposed to Defendant's request for a protracted report date. However, Ms. Gregorian appreciates that it was the Court's intention to allow Defendant to report to the Bureau of Prisons once his appeal had concluded, and consequently considers an extension of his report date to be appropriate under the circumstances. Accordingly, based on the foregoing, Defendant respectfully moves the Court for an Order extending his time to self-report to the Bureau of Prisons.

Respectfully Submitted,

/s/ Samuel H. Shamansky
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was filed with the Clerk of Court for the United States District Court for the Southern District of Ohio using the CM/ECF system, which will send notification of such filing to Alexis Gregorian, United States Department of Justice, 1400 New York Avenue N.W., Washington, D.C. 20005, on January 17, 2025.

/s/ Samuel H. Shamansky
SAMUEL H. SHAMANSKY